

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17120-3265

January 29, 2014

RE: Natural Gas Supply License A-125072

Secretary Chiavetta:

Pursuant to the Commission's Data Request dated September 26, 2012 and related correspondence, Direct Energy Business submits the following information regarding its Natural Gas Supply License in Docket No. A-125072:

- Attachment 1 response to Data Request 1 regarding Financial Fitness
- Attachment 2 original request for update to NGS License A-125072
- Verification per 52 Pa Code § 1.36

With this submission, Direct Energy Business believes it has met the requirements necessary to update NGS License A-125072 per the original request (Attachment 2) and respectfully requests fulfillment of same.

If there are any questions or comments regarding this submission, please contact me.

Regards,

Carl W. Boyd

Sr. Manager, Compliance carl.boyd@directenergy.com

Attachment 1

In the Commission's Order, entered March 2, 2000, at Docket No. A-125072, in Ordering Paragraph 3, the Commission directed the licensee to provide evidence of financial fitness with natural gas distribution companies (NGDCs) to the Commission pursuant to the bonding requirement at 66 Pa C.S. §2208(c).

Since the original Commission Order, Direct Energy Business, LLC (DEB) has revised the list of NGDCs. At this time, the list is as follows:

• Columbia Gas of Pennsylvania, Inc.

As demonstration of compliance with the requirements of 66 Pa C.S. §2208(c), please see the attached letter from Columbia Gas of Pennsylvania regarding Direct Energy Business, LLC's satisfaction of the financial security requirement to provide Natural Gas Supply Service to Columbia Gas customers.



October 15, 2012

Andy Vance Direct Energy Business, LLC. 1001 Liberty Avenue Pittsburgh, PA 15222

Dear Mr. Vance:

We are pleased that Direct Energy Business, LLC. ("DEB") has applied for a license to provide Natural Gas Supply Service on the distribution system of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas").

Under Paragraph 2.4.5 of the Rules Applicable to Distribution Service section of the Tariff of Columbia Gas, DEB could be required to provide to Columbia Gas a bond or other financial security instrument in an amount that Columbia Gas determines to be appropriate. We have determined at this time that DEB has met the financial security requirement to provide Natural Gas Supply Service to Columbia Gas customers.

If the creditworthiness requirement or Columbia Gas' exposure to DEB changes in the future, Columbia Gas might deem it appropriate to require DEB to provide a bond or other financial security instrument.

Please feel free to contact me at 614-460-6841 should you have any questions regarding a bond or other financial security instrument requirements of Columbia Gas.

Sincerely,

Michele Caddell

Manager, Supplier Services

Attachment 2



Tony Rametta
Energy Division Supervisor
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

August 7, 2012

RE: Natural Gas Supply License A-125072

Mr. Rametta:

Please accept this letter as a formal request to update the Natural Gas Supply (NGS) license issued to Strategic Energy, LLC in Docket No. A-125072.

In June 2008 Direct Energy Services, LLC purchased Strategic Energy, LLC. In September 2008 Strategic Energy, LLC underwent a legal name change to Direct Energy Business, LLC. Notices were provided to the PA PUC regarding these changes for Electric Generation Supply (EGS) license A-11025. A copy of said correspondence is attached for reference.

To date, no natural gas customers have been served on license A-125072. Direct Energy Business, LLC (fka Strategic Energy, LLC) wishes to begin offering natural gas supply services to commercial and industrial customers in all eligible utilities within the Commonwealth. As such, Direct Energy Business, LLC hereby respectfully requests that the PUC update license A-125072 accordingly.

If there are any questions or comments regarding this submission, please contact me.

Regards,

Carl W. Boyd

Sr. Manager, Compliance carl.boyd@directenergy.com

VERIFICATION

I, <u>Carl W. Boyd, Sr. Manager, Compliance</u>, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904.

Signature

Re NOR, Com

NOTARIAL SEAL Ebony Banks-Hubbard NOTARY PUBLIC Pittsburgh City, Allegheny County My Commission Expires 06/28/2016

Title

Date

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the persons indicated below by regular U.S. Mail.

	1
Irwin A. Poposwki	Mr. Richard Marshall
Office of Consumer Advocate	PG energy
Forum Place, 5 th Floor	One PEI Center
555 Walnut St.	Wilkes-Barre, PA 18711-0601
Harrisburg, PA 17120-1921	
Bernard A. Ryan, Jr.	Ms. Antioinette Litchy
Office of Small Business Advocate	Equitable Gas Company
Commerce Building, Suite 1102	200 Allegheny Center Mall
300 North Second Street	Pittsburgh, PA 15212-5352
Harrisburg, PA 17101	
Office of the Attorney General	Ms. Paula Frauen
Bureau of Consumer Protection	Columbia Gas of PA, Inc.
Strawberry Square, 14 th Floor	650 Washington Road
Harrisburg, PA 17120	Pittsburgh, PA 15228
Commonwealth of Pennsylvania	Mr. Kevin Carrabine
Department of Revenue	PECO
Bureau of Compliance	300 Front Street, Bldg. 2
Harrisburg, PA 17128-0946	Conshocken, PA 19428
Mr. James E. Patterson	Bob Bennett
National Fuel Gas Distribution Corp.	Manager of Fixed Utility Services
10 Lafayette Square	Pennsylvania Public Utility Commission
Buffalo, NY 14203	North Office Building
	Room 200
	Harrisburg, PA 17120
Mr. Jim Evans	Mr. Joe Gregorini
Penn Fuel	The Peoples Natural Gas Company
2 North 9 th Street	625 Liberty Avenue
GENA94	Pittsburgh, PA 15222
Allentown, PA 18101	
Mr. David Beaston	
UGI	
224 Morgantown Road	
Reading, PA 19611	

Date: March 13, 2014

Carl W. Boyd, Sr. Manager, Compliance